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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN DAIL MEADORS

Defendant.

CASE NO. 2:24-cr-00292-JAM

**STIPULATION AND ORDER TO CONTINUE
STATUS CONFERENCE AND EXCLUSION OF
TIME UNDER SPEEDY TRIAL ACT**

DATE: November 12, 2024
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its attorneys of record, Nchekube Onyima, Special Assistant United States Attorney, and Shea J. Kenny, Assistant United States Attorney, and defendant Kevin Dail Meadors, both individually and by and through his counsel of record, Adam T. Weiner, hereby stipulate as follows:

1. By previous order this matter was set for status on November 12, 2024, and excluded time from October 30, 2024, through November 12, 2024, under Local Code T4.

2. By this stipulation, defendant now moves to continue the status conference until **January 07, 2025, at 09:00 a.m.**, and to exclude time between November 12, 2024, and January 7, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

1 a) Defense counsel's entry of appearance was filed in this case on November 4,
2 2024.

3 b) Now that defense counsel has entered his appearance, the government is preparing
4 and in the process of producing discovery to defense counsel. The government has represented
5 that the discovery associated with this case includes several hundreds of pages of documents,
6 including police reports and images, as well as recorded interviews and videos. The discovery
7 also consists of at least one forensic report of the defendant's digital device. Some of this
8 discovery will require a Protective Order which the parties will negotiate. Due to the nature of
9 the discovery and the charges, much of the discovery will require inspection in the government's
10 office due to their content. All discovery will be produced directly to defense counsel and/or
11 made available for inspection and copying.

12 c) Counsel for defendant will require additional time to review and copy discovery
13 for this matter, discuss potential resolution with his client, and otherwise prepare for trial.

14 d) Counsel for defendant believes that failure to grant the above-requested
15 continuance would deny him the reasonable time necessary for effective preparation, taking into
16 account the exercise of due diligence.

17 e) The government does not object to the continuance.

18 f) Based on the above-stated findings, the ends of justice served by continuing the
19 case as requested outweigh the interest of the public and the defendant in a trial within the
20 original date prescribed by the Speedy Trial Act.

21 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
22 et seq., within which trial must commence, the time period of November 12, 2024 to January 7,
23 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
24 T4] because it results from a continuance granted by the Court at defendant's request on the basis
25 of the Court's finding that the ends of justice served by taking such action outweigh the best
26 interest of the public and the defendant in a speedy trial.
27
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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludible from the period within which a trial must commence.

IT IS SO STIPULATED.

PHILLIP A. TALBERT
United States Attorney

Dated: November 5, 2024

/s/Nchekube Onyima
NCHEKUBE ONYIMA
Special Assistant United States Attorney
SHEA J. KENNY
Assistant United States Attorney

Dated: November 5, 2024

/s/Adam T. Weiner
ADAM T. WEINER
Counsel for Defendant
Kevin Dail Meadors

ORDER

IT IS SO ORDERED.

Dated: November 05, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE